

Danner, Ward

From: Cindy Vador <cindyvador@gmail.com>
Sent: Monday, December 23, 2013 11:37 AM
To: Ken Miller
Cc: Paul Rosenfeld Ph.D.; hughbkaufman@comcast.net; simonianl@aol.com; cassandra wiseman; cami; paula dinerstein; Jeff Ruch; joy horowitz; Hope Edelman; Jennifer DENICOLA; NiColle Holland; stephanie smith; Christina Pascucci; melissa; dave; Armann, Steve; Wilson, Patrick; Greg Mitchell; felicity barringer; Robin Bravender; Randy Loftis; Juliet Eilperin
Subject: Re: EPA Provides Updated Guidance to Schools on PCB-containing Lighting Fixtures
Attachments: ATT00001.txt

Follow Up Flag: Follow up
Flag Status: Flagged

Fluorescent lights are still at MHS, inside and outside.

On Mon, Dec 23, 2013 at 10:32 AM, Ken Miller <kmiller@gormanmiller.com> wrote:

Yes, they claim all have been replaced.

Regards,

Ken Miller

From: Paul Rosenfeld Ph.D. [mailto:rosenfeld.paul@gmail.com]
Sent: Monday, December 23, 2013 10:22 AM
To: Ken Miller; hughbkaufman@comcast.net
Cc: jd18@me.com; simonianl@aol.com; 'cassandra wiseman'; 'cami'; 'paula dinerstein'; 'Jeff Ruch'; 'joy horowitz'; 'Hope Edelman'; 'Jennifer DENICOLA'; 'NiColle Holland'; 'Cindy Vador'; 'stephanie smith'; 'Christina Pascucci'; 'melissa'; 'dave'; armann.steve@epa.gov; wilson.patrick@epa.gov; 'Greg Mitchell'; 'felicity barringer'; 'Robin Bravender'; 'Randy Loftis'; 'Juliet Eilperin'
Subject: EPA Provides Updated Guidance to Schools on PCB-containing Lighting Fixtures

Dear All: On December 12, 2013 the EPA urged the nation's schools to replace all old florescent lights that may contain PCBs. I communicated with John Martin of the EPA and he stated this is a brand new NATIONAL policy. So the school should also ensure that all old florescent lights are replaced. I think they may have already replaced most if not all of the lights, but with so much misinformation who knows what is going on. Best wishes. Paul

EPA Provides Updated Guidance to Schools on PCB-containing Lighting Fixtures

Release Date: 12/12/2013

Contact Information: John Martin, (212) 637-3662, martin.johnj@epa.gov

(New York, N.Y.) The U.S. Environmental Protection Agency is providing important guidance to school administrators and maintenance personnel on how to properly maintain and manage fluorescent lighting with ballasts that contain polychlorinated biphenyls (PCBs). Many older ballasts contain PCBs that can leak when the ballasts fail, leading to elevated levels of PCBs in the air of schools. While the elevated PCB levels should not represent an immediate threat, they could pose health concerns if they persist over time. Leaking ballasts must be removed and properly disposed of along with any part of the fixture that has been contaminated with PCBs. In schools across the country, most PCB-containing fluorescent light ballasts have exceeded their life span and are beginning to leak and smoke. The guidance is part of the EPA's ongoing efforts to address potential PCB exposures in schools.

More than 150 incidents of leaking or smoking ballasts have been reported to the EPA from New York and New Jersey schools over the past 15 months. PCBs may cause cancer and have been shown to cause a number of serious non-cancer health effects in animals, including effects on the immune system, reproductive system, nervous system and endocrine system.

Lighting ballasts regulate the current to the lamps in fluorescent lights and provide sufficient voltage to start the lamps. Prior to 1979, PCBs were commonly used as an insulator in ballasts. In 1979, the EPA banned the processing or use of PCBs, except in totally enclosed equipment. However, a large number of fluorescent light ballasts that were installed prior to the ban or that were stored and used after the 1979 phase-out, may contain PCBs and may still be in use in the U.S.

The most likely way that people are exposed to PCBs from the ballasts is through breathing PCB-contaminated air or, if the ballast ruptures, by touching PCB-contaminated materials. When they remain in place, leaking ballasts can continue to release PCBs over several years and create elevated levels of PCBs in the air that students, teachers and other school workers breathe. The EPA recommends removing PCB-containing ballasts from buildings as soon as possible to prevent exposure.

Removal of PCB-containing fluorescent light ballasts, as part of lighting upgrades or a stand-alone project, is an investment that may pay off with long-term benefits to students, school staff, the community and the environment. A complete lighting retrofit eliminates the PCB hazards and increases energy efficiency by 30-50 percent. Lighting retrofits to eliminate PCB-containing fluorescent light ballasts should be considered as a component of any remodeling effort. The cost of replacing these fixtures can typically be recouped in less than seven years depending upon hours of operation and local energy costs. Detailed information on the savings that may be achieved and potential funding that may be acquired through an investment in new lighting is available at the Energy Star website, which also provides information about funding that may be available for the replacement of old fixtures: <http://energystar.gov>.

For more information and for the complete guidance on the proper maintenance, removal, and disposal of PCB-containing fluorescent light ballasts, visit: <http://www.epa.gov/epawaste/hazard/tsd/pcbs/pubs/ballasts.htm>.

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Paul Rosenfeld Ph.D.

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From: Paul Rosenfeld Ph.D. [<mailto:rosenfeld.paul@gmail.com>]

Sent: Sunday, December 22, 2013 7:21 PM

To: 'Ken Miller'; 'hughbkaufman@comcast.net'

Cc: 'jd18@me.com'; 'simonianl@aol.com'; 'cassandra wiseman'; 'cami'; 'paula dinerstein'; 'Jeff Ruch'; 'joy horowitz'; 'Hope Edelman'; 'Jennifer DENICOLA'; 'NiColle Holland'; 'Cindy Vandor'; 'stephanie smith'; 'Christina Pascucci'; 'melissa'; 'dave'; 'armann.steve@epa.gov'; 'wilson.patrick@epa.gov'; 'Greg Mitchell'; 'felicity barringer'; 'Robin Bravender'; 'Randy Loftis'; 'Juliet Eilperin'

Subject: Dr. Rosenfeld's Analysis- Malibu High School Needs A Thorough Investigation and Remediation.

Importance: High

Dear Concerned Parents: I have evaluated the data provided to me, but I actually had to submit Freedom of Information Act request to get the data in adobe acrobat. I was provided some data from school district, but was surprised the school district did not provide all of the data to me after requesting it. I had to manually enter the data into excel and it was extremely time consuming. It is very confusing to understand what exactly was done for there is no report supporting the data. The data collected thus far shows there to be significant concentrations of PCBs that require remediation via the Toxic Substance Control Act. My understanding is the School is going to investigate and remediate, but the methods and work plan should be written down for everyone to review. The concept that it may have been recommended that PCB air sampling be conducted with the windows open may make the past sampling suspect. But there is a lot of misinformation, so I do not know what is true or false. I do not want to speculate and there have been so many emails it is hard to know what the facts are.

Summary Of Dr. Rosenfeld's Findings:

1. 4 of 10 caulk samples exceeded 50 parts per million and require remediation via the Toxic Substance Control Act. In some instances caulk can have PCB concentrations as high as 300,000 parts per million. The highest caulk sample in Malibu had 1868 parts per million, and requires remediation.
2. 4 of 33 wipe samples exceeded the TSCA value of 10 micrograms per 100 cm square requiring remediation. More wipe sampling needs to be conducted.
3. More air sampling should be conducted especially on a hot day. The air samples show PCBs in the air but they were not above the Screening Levels published by the EPA for schools during the sampling period. The highest PCB levels found in a room were ~ 57 nanograms per cubic meter. The screening level for children ages 1 to 3 is 70 nanograms per cubic meter, but 450 and 600 nanograms per cubic meter for children from 12-15 and 15 to 18 respectively. I am not sure if the past samples were collected properly or not. Some individuals say that anything above 1 nanogram per cubic meter is too high.
4. It appears that there are about 10 paint samples that were collected, but it is not clear exactly how the samples were collected or what the data means.

5. The school should have a written a report explaining the past analysis, and a written work plan explaining how the future investigation and remediation are to take place. It is very unusual that this has not been done.
6. The question regarding the other contaminants is extremely valid and does need to be addressed.
7. I would suggest taking many more samples of caulk around the school to determine the significance of the PCB contamination though out the school in order to adequately remediate. Using method 8082 my firm could take 100 PCB samples of caulk around the school for \$7000 using a lab called CalScience (plus time and material) to figure out where the PCB contaminated material is around the school. It would end up costing close to \$30,000 with my firms time, travel and lab fees. So far only 10 caulk samples were taken and it was basically a screening analysis. Under TSCA the school must remediate the contaminated material above 50 parts per million, and it is not clear how that is to be done.

I am happy to work with the parents or the school district in the future and understand your concerns, but I would need to work on a time and material basis.

Let me know if you want me to continue assisting Malibu Parents For Healthy Schools.

Best Wishes,

Respectfully,

Paul Rosenfeld Ph.D.

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For further information, please contact the EPA Call Center at (866) 411-4EPA (4372). The TDD number is (866) 489-4900.

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